

IDEM

Nonrule Policy Document

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Title: Container Stacking Policy

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Other Policies Repealed or Amended: [none]

Citations Affected: 329 IAC 3.1-10-1, 40 CFR 265.31 & 35, 40 CFR 265.174

Brief Description of Subject Matter: Several regulated facilities have recently requested a statement concerning the policy of this agency toward the stacking of drums in storage facilities. Because of these requests, and because of the need to establish uniformity, the following policy is established.

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CONTAINER STACKING POLICY

Several regulated facilities have recently requested a statement concerning the policy of IDEM toward the stacking of drums in storage facilities. Because of these requests and because of the need to establish uniformity, the following policy is established.

Based on the types of facilities normally inspected by staff it is reasonable to require that fifty-five (55) gallon drums or other similar containers should be stored in rows that are no more than two (2) drums high and two (2) drums wide. This decision takes into consideration the following;

- 1) The required inspections are not only for detection of spills but are also for detection of container deterioration caused by corrosion or other factors. This inspection must be more thorough than that required for spill detection.

- 2) It is difficult to meet the weekly storage inspection requirement if personnel are required to go to extreme means such as use of ladders to complete inspections. The use of extreme means would be required when drums are more than two (2) high.
- 3) It is reasonable to require that rows be no more than two (2) drums wide because drums inside the rows are not visible if the rows are wider and would require containers to be moved in order to perform an adequate inspection.
- 4) Variability in container strength and condition make it unwise to stack containers more than two (2) high. This puts unnecessary strain on supporting containers underneath when a reasonable prediction cannot be made about their load bearing ability.
- 5) Variability in container dimensions can make stacking more than two (2) high risky because of the uncertain support given by different size containers.
- 6) Variability in number of drums on each pallet may also lead to some instability. It is not uncommon to find only three drums on a pallet.

The following three (3) regulatory requirements were reviewed in order to develop a general policy which addresses the majority of facility container storage or accumulation areas:

- 1) The basic requirement for the operation of facilities is that "Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned release of hazardous waste or hazardous constituents. . . " (329 IAC 3.1 -10-1 as adopted by reference from 40 CFR 265.31).
- 2) Container storage regulations state "The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area. . . " of the facility (329 IAC 3.1 -10-1 as adopted by reference from 40 CFR 265.35).
- 3) Waste must be stored so that the containers can be " . . . inspected for leaks and for deterioration caused by corrosion or other factors . . . " without moving them (329 IAC 3.1 -10-1 as adopted by reference from 40 CFR 265.174).

This policy must not be construed to limit the agency's ability to deviate from the guidelines set forth in this policy statement when necessary. Deviations from this policy will not be considered for generators and facilities under interim status, but may be allowed for facilities during Part B permit negotiations as a permit condition.

If you need additional information, or have any questions or concerns, please contact staff of the Compliance and Response Branch, Office of Land Quality, at 317-308-3101. The IDEM toll-free telephone number is 1-800-451-6027.